

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

STATE OF IOWA ex rel.
THOMAS J. MILLER,
ATTORNEY GENERAL OF IOWA,
99AG25112,

Plaintiff,

v.

PAUL GLUCHANICZ,
an individual, doing business inter alia as
SWEEPSTAKES RESEARCH LEGAL DEPT.,
ASSET ALLOCATION AUTHORITY, and
AMERICAN AWARD ADVISORY,

Defendant.

Equity No. CE 59161

PETITION IN EQUITY

CLERK DISTRICT COURT

2008 MAY 16 AM 11:14

FILED
POLK COUNTY, IA.

The State of Iowa ex rel. Attorney General Thomas J. Miller, through Assistant Attorney General Steve St. Clair, states as follows for its cause of action against the above-named defendant.

INTRODUCTION

1. Paul Gluchanicz of Wayne, Pennsylvania has owned and operated a direct mail scheme that tricks consumers – especially elderly consumers -- into thinking that they are poised to win a large cash prize and must send in \$20.00 as an “administration fee,” “registration fee,” or the like. In fact, the deceived consumers receive nothing more than a list of publicly-advertised sweepstakes and contests sponsored by other businesses. However, each consumer suffers more than the disappointment of undelivered prizes and wasted money -- he or she is being targeted for further loss. Gluchanicz uses his deceptive mailings to create lists of vulnerable consumers. Consumers on such lists can be expected to be predominantly older, and would have shown themselves – by their willingness to send a check to a stranger in response to ambiguous claims about winning a

sweepstakes – to be susceptible to prize promoters and fraudulent telemarketers. Gluchanicz markets these lists of vulnerable consumers to operations disposed to exploit them, and Gluchanicz has refused to identify those operations.

VENUE

2. Venue is proper in Polk County, Iowa, because the defendant has sent mail solicitations to, and accepted payment from, one or more residents of Polk County, and upon information and belief has marketed customer lists that have included one or more residents of Polk County. Iowa Code § 714.16 (10) (2007).

PARTIES

3. The Iowa Attorney General is authorized to bring this action on behalf of the State of Iowa by Iowa Code §§ 714.16 (7), 714B.7, and 714.16A(1) (2007).

4. Paul Gluchanicz resides at 1434 Glenhardie Road, Wayne, Pennsylvania 19087, and conducts or has conducted business through such companies and dba's as Sweepstakes Research Legal Department, Asset Allocation Authority, American Award Advisory, Keystone Associates, Inc., Solaris Direct, Inc., American Prize Publications, APP, Win America, American Sweeps Registry, Universal Consulting Services, Inc., Zodiac Direct, Inc., Paragon Direct Marketing, Inc. and Paragon Astrology, Inc., probably among others.

JURISDICTION

5. The Iowa Consumer Fraud Act, Iowa Code § 714.16 (2)(a) (2007) ("the Consumer Fraud Act") provides in pertinent part:

The act, use or employment by a person of an unfair practice, deception, fraud, false pretense, false promise, or misrepresentation, or the concealment, suppression or omission of a material fact with intent that others rely upon the concealment,

suppression, or omission, in connection with the lease, sale, or advertisement of any merchandise or the solicitation of contributions for charitable purposes, whether or not a person has in fact been misled, deceived, or damaged, is an unlawful practice.

6. Iowa Code § 714.16(1) provides the following definitions:

(f) "Deception" means an act or practice which has the tendency or capacity to mislead a substantial number of consumers as to a material fact or facts.

(n) "Unfair practice" means an act or practice which causes substantial, unavoidable injury to consumers that is not outweighed by any consumer or competitive benefits which the practice produces.

7. Iowa Code § 714.16 (7) provides, in pertinent part:

Except in an action for the concealment, suppression, or omission of a material fact with intent that others rely upon it, it is not necessary in an action for reimbursement or an injunction, to allege or to prove reliance, damages, intent to deceive, or that the person who engaged in an unlawful act had knowledge of the falsity of the claim or ignorance of the truth.

8. In describing remedies under the Consumer Fraud Act, Iowa Code subsection 714.16(7)

provides in pertinent part as follows:

If it appears to the attorney general that a person has engaged in, is engaging in, or is about to engage in a practice declared to be unlawful by this section, the attorney general may seek and obtain in an action in a district court a temporary restraining order, preliminary injunction, or permanent injunction prohibiting the person from continuing the practice or engaging in the practice or doing an act in furtherance of the practice. The court may make orders or judgments as necessary to prevent the use or employment by a person of any prohibited practices, or which are necessary to restore to any person in interest any moneys ... which have been acquired by means of a practice declared to be unlawful by this section ...

9. Iowa Code §§ 714.16A(1) & (3) provide, respectively:

If a person violates section 714.16, and the violation is committed against an older person, in an action by the attorney general, in addition to any other civil penalty, the court may impose an additional civil penalty not to exceed five thousand dollars for each such violation.

As used in this section, "*older person*" means a person who is sixty-five years of age or older.

10. Iowa Code Chapter 714B, "'Prize Promotions,'" requires a person who allows another person to obtain information about a prize to first provide such other person a written prize notice containing many specific items of information, presented in a particular format. Such prize notices must include, *inter alia*:

- a. The true name of the sponsor and the street address of the sponsor's actual principal place of business (*see* subsection 2(2)(a));
- b. the nature of any charge made (*see* subsection 2(2)(d));
- c. the number of people receiving the implied representation that they have an enhanced likelihood of receiving a prize (*see* subsection 2(2)(g));
- d. the prize's retail value and an odds statement, in immediate proximity to each reference to the prize, in the same size and boldness as such prize references, and in a particular format (*see* subsections 2(2)(b)&(c) and 3(a),(b) &(c)); and
- e. an upper case, bold-face legend regarding the required payment (*see* subsection 2(3)(d)).

11. In addition, the Prize Promotions law:

- a. prohibits a sponsor from representing that a person is entering a contest, drawing or other competitive enterprise when in fact the enterprise is a promotional scheme designed to make contact with prospective customers and all or a substantial number of those receiving the notice are awarded the same prize (*see* subsection 3(1)(c));
- b. prohibits a sponsor from selling consumer data that includes the dollars spent on non-compliant prize promotions (*see* subsection 3(1)(f));
- c. provides that a violation of the Prize Promotions law constitutes a violation of the Consumer Fraud Act (*see* section 714B.7).

FACTUAL AND LEGAL BACKGROUND

12. As the sole owner and primary operator of Sweepstakes Research Legal Department, Asset Allocation Authority and American Award Advisory, Defendant Gluchanicz sent mail

solicitations to persons with Iowa addresses at least as recently as 2005, and maintained customer lists that included one or more Iowans at least as recently as 2007.

13. The mail solicitations attached hereto as Attachment 1 through 3 were sent by Defendant to an elderly resident of West Des Moines, Iowa in 2005, and upon information and belief were also sent to other Iowans; the solicitation mailing attached as Attachment 4 was also used by Defendant at or about the same time, and Defendant has admitted that it may have been sent to Iowa residents.

14. Each mailing appearing as Attachment 1 through 3, as well as the mailing represented by Attachment 4 if it was in fact sent to one or more Iowa consumers, violates the Iowa Consumer Fraud Act in one or more of the following respects:

- a. By creating or encouraging the false impression that the mailing is the result of special effort to identify and locate the particular named recipient. This deception is achieved through a variety of techniques and devices, including the use of the dba "Asset Allocation Authority," as if the sender were charged with the responsibility of allocating assets, and by the use of such misleading phrases as "found by payer authority," "Division of Identification," and "I.D. Confirmed."
- b. By creating or encouraging the false impression that the recipient has won or is specially positioned to win a substantial cash award. This deception is achieved through the use of such headings as "payout confirmation notice," and through the use of such misleading (and often confusing) language as "I will accept a check for \$950,000.00 under a condition of supposition," and "I await with anticipation reported delivery (over and above) \$950,000.00 consideration-success-established, discovered in place as of 12:23 pm April 26, 2005, in U.S. dollar currency."
- c. By creating or encouraging the false impression that the mailing is some form of official notice, as opposed to a commercial solicitation. This deception is achieved through the use of such headings as "Official Notification" and "Legal Notice," through the supposed "registration" of the recipient's "claim," and through Defendant's employment of such titles as "Prize Notification Director," "Dispatch Officer, Audit Control Division," and "Legal Department Adjutant."

d. By creating or encouraging the false impression that the payment solicited from the recipient is in the nature of a fee for handling some aspect of the award of the cash prize.

This is accomplished through such designations as "delivery processing fee," "required \$20 administrative fee," and "registration fee."

15. In fact, a consumer who sends the \$20 payment receives nothing more than a listing of sweepstakes and contests being conducted independently by other businesses. A representative example received by an elderly Iowa consumer and titled "Disposition Report" appears as Attachment 5.

16. To the extent that Defendant's solicitations include disclosures that could serve to diminish the deception, such disclosures are presented in a manner that substantially reduces or eliminates their effectiveness. For instance, such disclosures are presented in dense, small-print blocks of upper case type; isolated on the back of solicitation pages; aligned along the border, perpendicular to the main text; and/or otherwise presented so as to minimize their effectiveness.

17. Upon information and belief, Defendant has marketed lists of persons who responded to solicitations like those described herein, which lists have included Iowans; in so doing, Defendant has marketed consumer information without disclosure to or consent of the affected consumers and has exposed vulnerable individuals to further victimization. Defendant's customer lists are believed to constitute a list of predominantly older individuals willing to send a check to a stranger in another state in response to vague or confusing claims about prize winnings. Such lists would prove invaluable to prize promoters or telemarketers with designs on the vulnerable elderly.

18. The Attorney General sought information regarding Defendant's list compiling and list marketing practices through a Civil Investigative Demand directed to Defendant in 2007 under

the authority of subsection 714.16 (3) of the Iowa Consumer Fraud Act; however, although Defendant acknowledged marketing customer lists, Defendant refused to provide specific information regarding such list transactions.

19. Although it is not necessary to establish reliance, damages or intent to deceive to obtain injunctive relief or reimbursement under the Consumer Fraud Act (*see* paragraph 7 above), establishing these factors, particularly intent, is nevertheless relevant *inter alia* to the Court's determination of the appropriate scope of injunctive relief and the appropriate amount of civil penalties. Those acts and practices of the defendant in violation of subsection (2)(a) of the Consumer Fraud Act as alleged in this Petition did in fact induce reliance on the part of consumer victims, did in fact cause damage to consumers, and/or were in fact intentional.

20. As a consideration relevant *inter alia* to the number and amount of civil penalties to be assessed, Paul Gluchanicz's business operations have previously been the focus of law enforcement efforts to prevent mailings containing false representations relating to cash prizes. Attachment 6 is a January 4, 2007 Cease and Desist Order imposed by Postal Authorities, and Attachment 7 shows Defendant Gluchanicz's signature on the Agreement that led to entry of the Cease And Desist Order.

21. Neither all nor any part of the application for injunctive relief herein has been previously presented to and refused by any court or justice. Iowa R. Civ. P. 1.1504.

22. In an action by the state, no security shall be required of the state. Iowa R. Civ. P. 1.207.

COUNT I

CONSUMER FRAUD ACT VIOLATIONS

23. Paragraphs 1 through 22 are incorporated herein by reference.

24. The acts and practices of defendants alleged herein constitute multiple violations of the prohibition of Iowa Code § 714.16(2)(a) against misleading, deceptive, unfair, and omissive acts and practices, and otherwise violate that provision of Iowa law.

COUNT II

IOWA PRIZE PROMOTIONS LAW

25. Paragraphs 1 through 22 above are incorporated herein by reference.

26. The acts and practices of defendants alleged herein constitute multiple violations of the notice, disclosure, and other requirements of Iowa Code § 714B.

COUNT III

CONSUMER FRAUDS COMMITTED AGAINST OLDER PERSONS

27. Paragraphs 1 through 22 above are incorporated herein by reference.

28. Many of the Consumer Fraud Act violations (both direct and by virtue of section 714B.7) for which the defendants are responsible were committed against older persons and give rise to the additional civil penalties provided for in section 714.16A.

PRAYER

Plaintiff prays the Court grant the following relief:

A. Pursuant to Iowa Code § 714.16 (7), and upon further request by Plaintiff therefor addressed to the Court, enter a temporary restraining order and preliminary injunction restraining the defendant and his partners, employees, agents, servants, representatives, affiliates,

successors, assigns, and all other persons, corporations and other entities acting in concert or participating with the defendants who have actual or constructive notice of the Court's injunction from engaging in the deceptive, misleading, omissive, and unfair practices alleged in this Petition and from otherwise violating the Iowa Consumer Fraud Act and the Iowa Prize Promotions law.

B. Pursuant to Iowa Code § 714.16 (7), after trial on the merits, make permanent the above-described injunction, expanding its provisions as necessary by including *inter alia* such "fencing in" provisions as are reasonably necessary to ensure that the defendant and other enjoined persons and entities do not return to the unlawful practices alleged herein, or commit comparable violations of law.

C. Pursuant to Iowa Code § 714.16 (7), enter judgment against Defendant for amounts necessary to restore to Iowa consumers all money acquired by means of acts or practices that violate the Consumer Fraud Act and/or the Prize Promotions law.

D. Pursuant to Iowa Code § 714.16 (7), enter judgment against defendant for such additional funds as are necessary to ensure complete disgorgement of all ill-gotten gain traceable to the unlawful practices alleged herein.

E. Pursuant to Iowa Code § 714.16 (7), enter judgment against Defendant for up to \$40,000.00 for each separate violation of the Consumer Fraud Act and/or the Prize Promotions law.

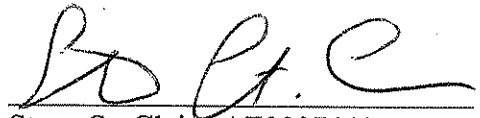
F. Pursuant to Iowa Code § 714.16A, enter judgment against Defendant for an additional civil penalty not exceeding \$5,000.00 for each separate violation of the Consumer Fraud Act (and, through operation of section 714B.7, the Prize Promotions law) committed against an older person within the meaning of Iowa Code § 714.16A.

G. Award Plaintiff interest as permitted by law.

H. Pursuant to Iowa Code § 714.16 (11), enter judgment against Defendant for attorney fees, state's costs and court costs.

I. Grant such additional relief as the Court deems just and equitable.

Thomas J. Miller
Attorney General of Iowa

A handwritten signature in black ink, appearing to read "Steve St. Clair", is written over a horizontal line.

Steve St. Clair AT0007441
Assistant Attorney General
Hoover Building, 2d Floor
Des Moines, Iowa 50319
Ph: 281-5926
Fax: 281-6771

***** FOUND BY PAYER AUTHORITY *****

10:17 AM April 7, 2005 TRACK Terry H [REDACTED]

Payer Office [Signature]

3:14 P.M. April 7, 2005 TRACE [REDACTED], West Des Moines, IA 50266-[REDACTED]

Payer Office [Signature]

9:04 AM April 8, 2005 CHECK PAYER FINDING AGAINST PROVISO STAR LISTEE/AUTHORITY BUREAU HDQTRS

Payer Office [Signature]

SUCCESS ESTABLISHED 100%, 12:23 PM April 8, 2005

NOTIFY PROVISO STAR LISTEE OF PAYER DELIVER NOTIFICATION VIA MAIL AS FOLLOWS:



Terry H [REDACTED]

West Des Moines, IA 50266-[REDACTED]

Payor Office [Signature]

Message: This is Advisee Emergency Information FOR YOU ... report now ready to go having found you starred *** a Proviso Star Listee "Terry H [REDACTED]" *** regarding official prize consideration-success-established monetary sum ... at the time of this report finding, exceeding

(over and above) \$950,000.00*****NINE HUNDRED AND FIFTY THOUSAND DOLLARS

Please hold this payer surprise news until your response has been received by the Asset Allocation Authority and reported delivery takes place.

Complete Bottom Portion and Return As Advised To: Asset Allocation Authority (Use Our Envelope Only Please)

NON-TRANSFERABLE/FILE

THIS CORRESPONDENCE IS AN OFFER TO PURCHASE A PUBLISHED REPORT FROM ASSET ALLOCATION AUTHORITY, CONTAINING ENTRY DETAILS FROM INDEPENDENT CORPORATIONS WHO PROVIDE CASH AND PRIZE SWEEPSTAKES OPPORTUNITIES TO THE GENERAL PUBLIC. ASSET ALLOCATION AUTHORITY REQUIRES A FEE TO SUPPLY THE REPORT TO THOSE WISHING TO RECEIVE INFORMATION ON THESE SWEEPSTAKES. RESPONDENTS MAY REVIEW REPORT AND ENTER LISTED SWEEPSTAKES BY FOLLOWING PUBLISHED ENTRY GUIDELINES. ASSET ALLOCATION AUTHORITY IS NOT AFFILIATED WITH ANY SWEEPSTAKES SPONSORS AND DOES NOT CONDUCT OR PROVIDE ENTRY INTO SWEEPSTAKES OR AWARD PRIZES TO WINNERS. ALL PRIZES ARE WARRANTED TO BE PAID BY REPORTED SPONSORS PER SPONSORS' REGULATIONS AND RULES. IF PUBLISHING ERRORS OCCUR, ASSET ALLOCATION AUTHORITY IS LIABLE TO THE RESPONDENT ONLY FOR AN AMOUNT OF MONEY EQUIVALENT TO THE AMOUNT PAID TO ASSET ALLOCATION AUTHORITY BY THE RESPONDENT. ASSET ALLOCATION AUTHORITY IS NOT A LOTTERY, GOVERNMENT AGENCY OR CONTEST OPERATOR AND IS NOT RESPONSIBLE FOR LOST, STOLEN, ILLEGIBLE ENTRIES, OR LOST OR DESTROYED MAIL. VARIOUS TRADE PRESENTATIONS OF THIS OFFER MAY ALSO BE MADE. IF RESPONDENT RECEIVES DUPLICATE REPORTS OR IS DISSATISFIED WITH OUR PRODUCT OR SERVICE, PURCHASE PRICE IS 100% REFUNDABLE UPON RECEIPT OF WRITTEN REQUEST WITHIN 60 DAYS OF PURCHASE. VOID WHERE PROHIBITED. OCCASIONALLY WE SHARE OUR CUSTOMER LIST WITH FIRMS WHO'S PRODUCTS AND MAILINGS MAY BE OF INTEREST TO YOU. IF YOU WOULD PREFER NOT TO RECEIVE ADDITIONAL MAILINGS FROM US, PLEASE RETURN THIS LETTER WITH YOUR REQUEST TO THE ATTENTION OF CUSTOMER SERVICE. MAIL YOUR REQUEST TO THE ADDRESS PROVIDED ON THE RETURN ENVELOPE. ASSET ALLOCATION AUTHORITY, PO BOX 24605, WEST PALM BEACH, FLORIDA 33416-4605.

DETACH AND MAIL IN ENVELOPE PROVIDED

M1E1 213-750

Reply required (ASAP)

I am the Claimant. My name's Terry H [REDACTED] My address is (or was) [REDACTED], West Des Moines, IA, with the zip code 50266-[REDACTED]. Below is my signature attesting to the truth of the preceding statement.

X

Terry H [REDACTED]

West Des Moines, IA 50266-[REDACTED]

If current address has changed, correct below:

PLEASE PRINT:

NON-TRANSFERABLE/FILEID NO: 3289102099

Re prize: I await with anticipation reported delivery (over and above) \$950,000.00 consideration-success-established, discovered in place as of 12:23 pm April 12, 2005, in U.S. dollar currency.

Delivery processing fee (required up front): \$20. I enclose by cash, check or money order payable to: Asset Allocation Authority

MAIL IN ASSET ALLOCATION AUTHORITY ENVELOPE PROVIDED FOR Terry H [REDACTED], West Des Moines, IA 50266-[REDACTED]

FOUND BY PAYER AUTHORITY

M1E1 213-750



ATTACHMENT 1
(page 1 of 2)

No action can take place until we are in possession of this completed form.

Asset Allocation Authority, PO Box 24605, West Palm Beach, FL 33416-4605

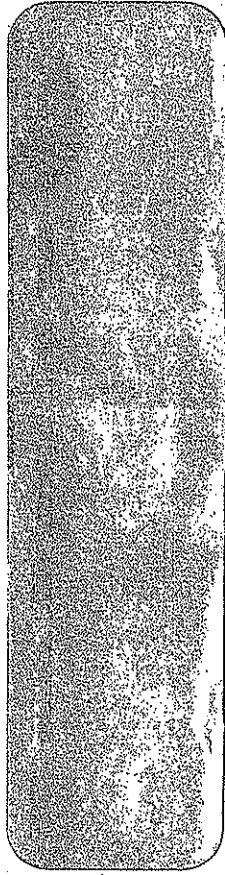
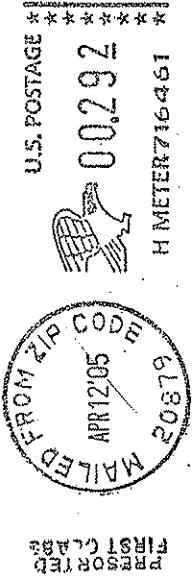
Payer Office
Asset Allocation Authority

PO Box 24605
West Palm Beach, FL 33416-4605

SUCCESS ESTABLISHED 100% PROVISO STARRED LISTEE INSIDE

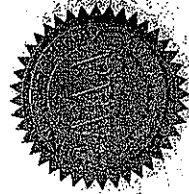
FOUND - PAYER AUTHORITY

M1E1 213-749



ADDRESS CONFIRMATION

POSTAGE
REQUIRED.
POST OFFICE WILL
NOT DELIVER
WITHOUT PROPER
POSTAGE.



Asset Allocation Authority
PO BOX 24605
West Palm Beach, FL, 33416-4605

M1E1 213-748



PAYOUT CONFIRMATION NOTICE

RECIPIENT IDENTIFIED

DIVISION OF IDENTIFICATION

MONIES AND PRIZES BEING PAID

M1C1 213-709



MAIN OFFICE LETTER & NOTICE

BY SPONSORS FOR ENTRANTS



Terry H [REDACTED]

West Des Moines, IA 50266 [REDACTED]

I.D. CONFIRMED

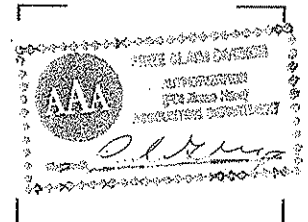
Terry H [REDACTED]
NBM05_HL

[Filed and now On Record]

Attention: Terry H [REDACTED]

I am the Prize Notification Director at Asset Allocation Authority, and have been officially designated to contact Terry H [REDACTED] of West Des Moines, IA. Registered Amounts totaling in excess of \$1,200,000.00 have been designated as unawarded and your name has been officially nominated for the full amount. All taxes are the sole responsibility of the claimant. Company policy insists that you be notified by mail regarding this matter. Please return the attached Payout Confirmation Form in enclosed envelope to expedite release of full claim documentation and prize distribution procedures and deadlines.

Dispatch Officer
Audit Control Division



THIS CORRESPONDENCE IS AN OFFER TO PURCHASE A PUBLISHED REPORT FROM ASSET ALLOCATION AUTHORITY, CONTAINING ENTRY DETAILS FROM INDEPENDENT CORPORATIONS WHO PROVIDE CASH AND PRIZE SWEEPSTAKES OPPORTUNITIES TO THE GENERAL PUBLIC. ASSET ALLOCATION AUTHORITY REQUIRES A FEE TO SUPPLY THE REPORT TO THOSE WISHING TO RECEIVE INFORMATION ON THESE SWEEPSTAKES. RESPONDENTS MAY REVIEW REPORT AND ENTER LISTED SWEEPSTAKES BY FOLLOWING PUBLISHED ENTRY GUIDELINES. ASSET ALLOCATION AUTHORITY IS NOT AFFILIATED WITH ANY SWEEPSTAKES SPONSORS AND DOES NOT CONDUCT OR PROVIDE ENTRY INTO SWEEPSTAKES OR AWARD PRIZES TO WINNERS. ALL PRIZES ARE WARRANTED TO BE PAID BY REPORTED SPONSORS PER SPONSORS' REGULATIONS AND RULES. IF PUBLISHING ERRORS OCCUR, ASSET ALLOCATION AUTHORITY IS LIABLE TO THE RESPONDENT ONLY FOR AN AMOUNT OF MONEY EQUIVALENT TO THE AMOUNT PAID TO ASSET ALLOCATION AUTHORITY BY THE RESPONDENT. ASSET ALLOCATION AUTHORITY IS NOT A LOTTERY, GOVERNMENT AGENCY OR CONTEST OPERATOR AND IS NOT RESPONSIBLE FOR LOST, STOLEN, ILLEGIBLE ENTRIES, OR LOST OR DESTROYED MAIL. VARIOUS TRADE PRESENTATIONS OF THIS OFFER MAY ALSO BE MADE. IF RESPONDENT RECEIVES DUPLICATE REPORTS OR IS DISSATISFIED WITH OUR PRODUCT OR SERVICE, PURCHASE PRICE IS 100% REFUNDABLE UPON RECEIPT OF WRITTEN REQUEST WITHIN 60 DAYS OF PURCHASE. VOID WHERE PROHIBITED. OCCASIONALLY WE SHARE OUR CUSTOMER LIST WITH FIRMS WHO'S PRODUCTS AND MAILINGS MAY BE OF INTEREST TO YOU. IF YOU WOULD PREFER NOT TO RECEIVE ADDITIONAL MAILINGS FROM US, PLEASE RETURN THIS LETTER WITH YOUR REQUEST TO THE ATTENTION OF "CUSTOMER SERVICE" P.O. BOX 24605, WEST PALM BEACH, FL 33416.

↓ DETACH AND MAIL IN ENVELOPE PROVIDED ↓

PAYOUT CONFIRMATION FORM

Upon receipt of this signed and dated Payout Confirmation Form, the designated party is to receive full status report totaling over \$1,200,000.00 in unclaimed cash and prizes with all necessary claim directives.

Reported Amount over:

Enclosed is required \$20 administration fee payable by cash, check or money order to: Asset Allocation Authority.

THE SUM 1,200,000.00

FORM No. NBM05_HL

REGISTERED TO: Terry H [REDACTED]

Terry H [REDACTED]
West Des Moines, IA 50266 [REDACTED]

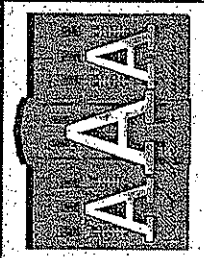
THE OFFICIAL SIGNATURE OF (Terry H [REDACTED])

Asset Allocation Authority
P.O. Box 24605
West Palm Beach, FL 33416-4605

ATTACHMENT 2

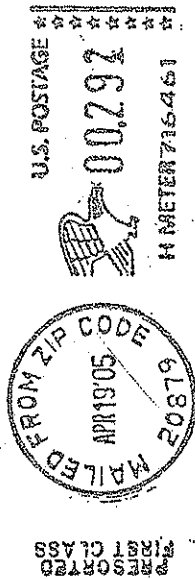
(page 1 of 2)

A5



P.O. BOX 24605
WEST PALM BEACH, FL 33416-4605

MIC1 213-699



Official Notice Open Immediately

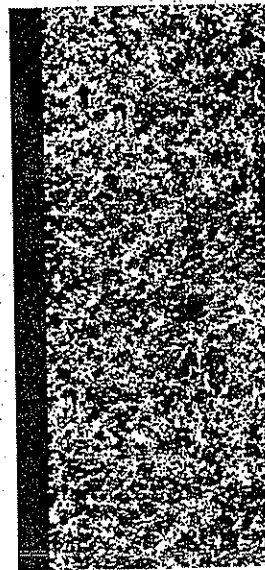
USPS Mail

A5

FOR INTERNAL USE ONLY:
ATTN: UPON RECEIPT, PLEASE DIRECT TO FINANCIAL
DIRECTOR FOR IMMEDIATE ATTENTION.

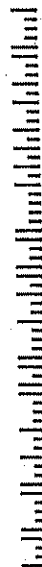


Signed: *Paul R. King*
Dispatch Officer
Audit Control Division
MIC1 213-701



Place
Stamp
Here

Asset Allocation Authority
P.O. Box 24605
West Palm Beach, FL 33416-4605



NBM05_HL

M1B1 213-705

OFFICIAL NOTIFICATION

CONFIRMED: Terry H

CLAIM NUMBER: 3289037158

Sweepstakes Research Legal Department
 Asset Allocation Authority
 PO Box 24605
 West Palm Beach, FL 33416-4605

Official Notice:

This notice has been prepared solely and exclusively
 for the benefit of Terry H

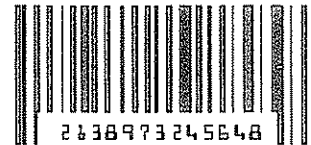
CONFIRMED

CONFIDENTIAL

For: Terry H

RECORD OF
RECEIPT

Terry H
 West Des Moines, IA 50266-



*Urgent subject matter
 Your immediate response required.*

Dear Terry H

\$950,000.00 I can't make it any plainer. I can't make it any easier.

Nine hundred fifty thousand dollars. Free and clear.

Pursuant to a directive promulgated by our internal client, this official missive originating in the offices of the undersigned has been dispatched to your listed domicile as your last known place of residence.

When in the course of quotidian commerce, such notice comes to the attention of the addressee, the prudent choice is to waste no time in replying. In certain identified instances, a small payment, usually \$20 United States, will hasten delivery of a document which will prove to be an authoritative directory of the precise intelligence necessary to collect large sums of money.

The Official Report is your key. I would have to say that if all evidence were to be accumulated to reside in a specified official depository, and if all government witnesses were to be heard,

no individual,
no corporation,
no government,

would have any entitlement whatsoever to withhold or to confiscate in any manner monetary or other property which is rightfully yours legally due to you via direct cash payment, electronic transfer of funds (ETF) or promissory instrument. Integrity of your property. In other words, what is yours is yours. Your money is your money.

A conscientiously administered protocol of research and discovery have already been applied to produce - at an extremely high confidence level - a most complete and accurate matrix of sweepstakes awards, along with the publication of entry requirements.

Claiming winnings is vital. Picture yourself holding a winning ticket. You the winner! Would you know what to do with it? Be sure to mail for your Official Report.

The sweepstakes with the absolute highest payout in U.S. dollars requires NO ENTRY FEE! Without the Official Report, I would venture to say, you could not register for even the possibility of getting that check for \$950,000.00.

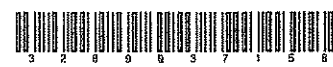
Full instructions for delivery are attached below entitled ORDERING PROCEDURE. Your timing is critical. A quick response will correlate with quicker delivery. A forthcoming delivery of a cash award may be in the offing.

Do not even take a chance of losing these papers. I recommend going directly to ORDERING PROCEDURE below and filling in the requested information. Send payment is listed. Do not wait another day.

Yours sincerely,

Legal Department Adjutant

ATTACHMENT 3
 (page 1 of 3)



THIS CORRESPONDENCE IS AN OFFER TO PURCHASE A PUBLISHED REPORT FROM ASSET ALLOCATION AUTHORITY, CONTAINING ENTRY DETAILS FROM INDEPENDENT CORPORATIONS WHO PROVIDE CASH AND PRIZE SWEEPSTAKES OPPORTUNITIES TO THE GENERAL PUBLIC. ASSET ALLOCATION AUTHORITY REQUIRES A FEE TO SUPPLY THE REPORT TO THOSE WISHING TO RECEIVE INFORMATION ON THESE SWEEPSTAKES. RESPONDENTS MAY REVIEW REPORT AND ENTER LISTED SWEEPSTAKES BY FOLLOWING PUBLISHED ENTRY GUIDELINES. ASSET ALLOCATION AUTHORITY IS NOT AFFILIATED WITH ANY SWEEPSTAKES SPONSORS AND DOES NOT CONDUCT OR PROVIDE ENTRY INTO SWEEPSTAKES OR AWARD PRIZES TO WINNERS. ALL PRIZES ARE WARRANTED TO BE PAID BY REGISTERED SPONSORS PER SPONSORS' REGULATIONS AND RULES. IF PUBLISHING ERRORS OCCUR, ASSET ALLOCATION AUTHORITY IS LIABLE TO THE RESPONDENT ONLY FOR AN AMOUNT OF MONEY EQUIVALENT TO THE AMOUNT PAID TO ASSET ALLOCATION AUTHORITY BY THE RESPONDENT. ASSET ALLOCATION AUTHORITY IS NOT A LOTTERY, GAMING AGENCY OR CONTEST OPERATOR AND IS NOT RESPONSIBLE FOR LOST, STOLEN, ILLEGIBLE ENTRIES, OR LOST OR DESTROYED MAIL. VARIOUS TRADE PRESENTATIONS OF THIS OFFER MAY ALSO BE MADE. IF RESPONDENT RECEIVES DUPLICATE REPORTS OR IS DISSATISFIED WITH OUR PRODUCT OR SERVICE, PURCHASE PRICE IS 100% REFUNDABLE UPON RECEIPT OF WRITTEN REQUEST WITHIN 60 DAYS OF PURCHASE. VOID WHERE PROHIBITED. OCCASIONALLY WE SHARE OUR CUSTOMER LIST WITH FIRMS WHO'S PRODUCTS AND MAILINGS MAY BE OF INTEREST TO YOU. IF YOU WOULD PREFER NOT TO RECEIVE ADDITIONAL MAILINGS WE TURN LETTER WITH REQUEST TO CUSTOMER SERVICE, P.O. BOX 24605, WEST PALM BEACH, FL 33416.

↓ DETACH AND MAIL IN ENVELOPE PROVIDED ↓

ORDERING PROCEDURE

FORM No. NBM05_HL

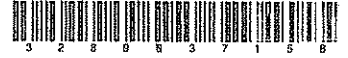
CONFIRMED

- ☐ YES, I will accept a check for \$950,000.00 under a condition of supposition.
- ☐ YES, I have enclosed the materials fee of only \$20.00 for the Official Report. Payable to Asset Allocation Authority.
- ☐ NO, due to personal or income tax reasons, which I am not obliged to detail herein, I refuse to exercise my legal right to qualify for sweepstakes awards.
- ☐ Sign and date where indicated.

X. _____
SIGNATURE / DATE

Terry H. [REDACTED]
[REDACTED]
West Des Moines, IA 50266-[REDACTED]

M1B1 213-702



Asset Allocation Authority PO Box 24605, West Palm Beach, FL 33416-4605

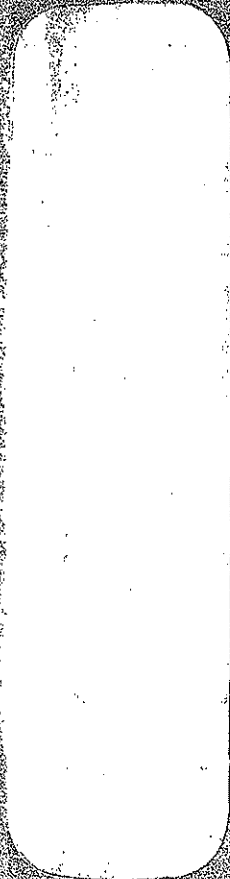
Sweepstakes Research Legal Department
Asset Allocation Authority
PO BOX 24605
West Palm Beach, FL 33416-4605

LEGAL NOTICE

Registered code No. RB1875 WGE

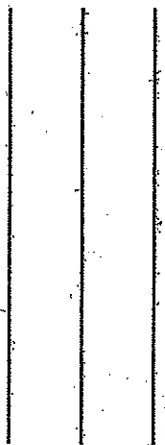
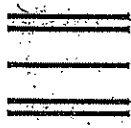
MTB1 213-702

This notice is in full legal compliance with Federal and State Laws



POSTMASTER: Please observe security regulations as specified in Section F020 of United States Postal Service Domestic Mail Manual if addressee has moved.

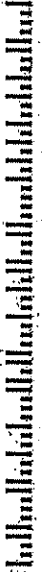
PLACE
STAMP
HERE



MTB1 213-703



Sweepstakes Research Legal Department
Asset Allocation Authority
PO BOX 24605
West Palm Beach, FL 33416-4605



CASH IN THIS ENTITLEMENT RECORD

ASSET ALLOCATION AUTHORITY

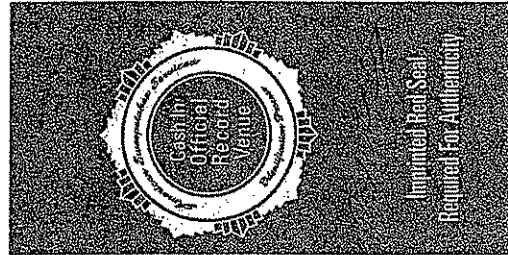
YOUR ALLOWANCE: Eligibility in effect is good for over [] \$12,755.08 [] \$84,921.00
[] \$234,162.20 [] \$293,001.01 ☒ \$1,200,000.00 [] \$4,144,202.00.



NB505



Florence R [REDACTED]
Los Angeles, CA 90066 [REDACTED]



ISSUER STATEMENT

EXECUTOR NO 213-888 MLD2

ORIGINAL COPY **READ CAREFULLY** KEEP WITH YOUR FINANCIAL RECORDS

*****Be Apprised Of The Following Statement Dated June 10, 2005*****

Dear Florence R [REDACTED]

You should know and take the proper steps related to the facts in your possession. This document is rightfully yours.

We have just been notified that an amount in U.S. Currency exceeding (in dollars) over \$1,200,000.00 is in your Allowance Eligibility National System Record which report can go out to you immediately, to take action regarding same. To make claim with your eligibility for what may be yours...just like that. [Florence R] THIS IS NO MISPRINT! We await your instructions. (In release of your signature acknowledging address we show for Florence R to be yours and correct. If it is not, we need to update our information with your current address.)

THIS IS IMPORTANT! WITHOUT YOUR SIGNING OFF ON YOUR HOME RESIDENCE YOU CANNOT BENEFIT FROM THIS DOCUMENT (FINANCIAL STATEMENT MADE OUT IN YOUR NAME).

Please return bottom portion now - after you have filled it in as instructed. Time is of the essence with respect to your over \$1,200,000.00 document that is for you and actionable by you now. [You are entitled.]

Detach and return the bottom portion with payment in the enclosed envelope

Asset Allocation Authority

ISSUER REGISTRATION

3298442050

EXECUTOR NO 213-888 MLD2

I wish to cash my entitlement record from the authority. I understand you have been notified that an amount in U.S. currency exceeding (in dollars) over \$1,200,000.00 is in my Allowance Eligibility National System Record, which report, can go out to me immediately, to take action regarding the same. I have the original copy of this uncontested document of eligibility dated June 10, 2005. I look forward to all that may be mine, and pursuant to that understanding, I AGREE TO THE FOLLOWING.

The address you have registered as my official residence is (CHECK ONE BOX)
☐ Correct ☐ Incorrect and I've entered my current address

NB505

Florence R [REDACTED]
Los Angeles, CA 90066 [REDACTED]

If incorrect, this is my current address (please print).

I have enclosed registration fee of \$20.00 Cash, Check, or Money Order made payable to: Asset Allocation Authority

☒ Recipient Signature Required

ATTACHMENT 4
(page 1 of 2)

THIS CORRESPONDENCE IS AN OFFER TO PURCHASE A PUBLISHED REPORT FROM ASSET ALLOCATION AUTHORITY, CONTAINING ENTRY DETAILS FROM INDEPENDENT CORPORATIONS WHO PROVIDE CASH AND PRIZE SWEEPSTAKES OPPORTUNITIES TO THE GENERAL PUBLIC. ASSET ALLOCATION AUTHORITY REQUIRES A FEE TO SUPPLY THE REPORT TO THOSE WISHING TO RECEIVE INFORMATION ON THESE SWEEPSTAKES. RESPONDENTS MAY REVIEW REPORT AND ENTER LISTED SWEEPSTAKES BY FOLLOWING PUBLISHED ENTRY GUIDELINES. ASSET ALLOCATION AUTHORITY IS NOT AFFILIATED WITH ANY SWEEPSTAKES SPONSORS AND DOES NOT CONDUCT OR PROVIDE ENTRY INTO SWEEPSTAKES OR AWARD PRIZES TO WINNERS. ALL PRIZES ARE WARRANTED TO BE PAID BY REPORTED SPONSORS PER SPONSORS' REGULATIONS AND RULES. IF PUBLISHING ERRORS OCCUR, ASSET ALLOCATION AUTHORITY IS LIABLE TO THE RESPONDENT ONLY FOR AN AMOUNT OF MONEY EQUIVALENT TO THE AMOUNT PAID TO ASSET ALLOCATION AUTHORITY BY THE RESPONDENT. ASSET ALLOCATION AUTHORITY IS NOT A LOTTERY, GOVERNMENT AGENCY OR CONTEST OPERATOR AND IS NOT RESPONSIBLE FOR LOST, STOLEN, ILLEGIBLE ENTRIES, OR LOST OR DESTROYED MAIL. VARIOUS TRADE PRESENTATIONS OF THIS OFFER MAY ALSO BE MADE. IF RESPONDENT RECEIVES DUPLICATE REPORTS OR IS DISSATISFIED WITH OUR PRODUCT OR SERVICE, PURCHASE PRICE IS 100% REFUNDABLE UPON RECEIPT OF WRITTEN REQUEST WITHIN 60 DAYS OF PURCHASE. VOID WHERE PROHIBITED. OCCASIONALLY WE SHARE OUR CUSTOMER LIST WITH FIRMS WHO'S PRODUCTS AND MAILINGS MAY BE OF INTEREST TO YOU. IF YOU WOULD PREFER NOT TO RECEIVE ADDITIONAL MAILINGS FROM US, PLEASE RETURN THIS LETTER WITH YOUR REQUEST TO THE ATTENTION OF "CUSTOMER SERVICE". MAIL YOUR REQUEST TO THE ADDRESS PROVIDED ON THE RETURN ENVELOPE.

DISPOSITION REPORT

Asset Allocation Authority
PO Box 24605
West Palm Beach, FL 33416-4605

Release Authorization PG
Volume Number 01
Issue Number 15

3300240124

Terry H [REDACTED]

West Des Moines IA 50266 [REDACTED]

|||||

LEGAL RIGHT TO OVER \$2,313,000

This authorized documentation originates from and is distributed by the Asset Allocation Authority National Headquarters located in West Palm Beach, Florida. All data contained herein has been compiled in accordance with official company regulations and is intended for the personal use of the addressee(s) specified. All rights reserved.

CLAIM INSTRUCTIONS

ALOTTERY.COM

Entrance Deadline: Ongoing.

Prize(s): \$100,000 payable in twenty-five annual installments.

Eligibility Requirements: Open to all worldwide except for The Netherlands. Void NY, FL, Quebec. Must be 18 or older.

Entry Procedures: Visit <http://www.aLottery.com>, provide your e-mail address, select 6 numbers (between 1 and 49) or choose QuickPick. And click on the "Make My Ticket" button. The validation page will appear in your browser. In order for your entry to be submitted, you must click on one of the sponsor's banners. Multiple visits to an advertiser will result in ticket disqualification.

Drawing: The winning numbers are the same as the Saturday US PowerBall drawing.

AMERICAN BEAUTY SWEEPSTAKES

Entrance Deadline: July 15, 2005.

Prize(s): Grand Prize: \$50,000 Cash.

Eligibility Requirements: US residents 18 or older. Void PR.

Entry Procedures: To enter, use a 3 1/2 x 5 1/2 postcard. Print your name, address, phone number, age and email address. Mail to Sweepstakes Entry, c/o 123 Click, Inc., P.O. Box 5225, Harrisburg, PA 17110.

Drawing: August 2005.

Notes: Limited to one entry per person.

ANGEL SOFT BATHROOM MOMENTS SWEEPSTAKES

Entrance Deadline: All online entries must be received by 11:59 PM ET on June 1, 2005. All mail-in entries must be postmarked by June 1, 2005 and received by June 8, 2005.

Prize(s): Winner will receive \$10,000 in the form of a check and one year supply of Angel Soft toilet paper (to be awarded in the form of 192 rolls of white 198 count rolls -- valued at \$80.00). ARV \$10,080.

Eligibility Requirements: Contest is open only to legal residents of the 50 United States and the District of Columbia, who are at least 18 years of age as of date of entry.

Entry Procedures: There are two ways to enter. 1) visit www.angelsoftpresents.com and complete an online registration form, including a 200-word essay describing an uncomfortable bathroom moment that you have personally experienced. 2) To submit your entry via mail, on a 8" x 11" piece of paper, legibly hand-print or type your name, complete address, date of birth, day and evening telephone numbers (including area code) and a 200-word description of your Uncomfortable bathroom moment. Mail to: Angel Soft "Hilarious Bathroom Blunders" Contest, 676 N. St. Claire, Suite 1000, Chicago, IL 60611.

Judgment: All eligible entries received by Sponsor will be judged by a panel of qualified judges on the following criteria: Creativity of essay (25%), Quality of writing (25%), Humor (25%) and Relevance to Essay Topic (25%).

Notes: Limit one entry per person/email/household, regardless of method of entry. Entry must be entrant's own original work, true and verifiable and may not be offensive or profane.

ATTACHMENT 5

(page 1 of 4)

SEARCH FOR THE KID WITH THE SHARPEST TASTE BUDS

Entrance Deadline: All entries must be received by July 31, 2005.

Prize(s): \$1,000 cash to be awarded as a check, a new refrigerator, a personalized \$1 million policy to insure winner's taste buds for one year and a virtual office in the "Good Taste Labs" division at ARM & HAMMER's corporate headquarters in Princeton, NJ. ARV \$9,600.

Eligibility Requirements: Open to legal residents of the 50 United States and the District of Columbia who are 8 to 12 years of age at time of entry.

Entry Procedures: Visit www.armhammergoodtastelabs.com and print out an Official Entry Form. In 100 words or less, explain why your taste buds are the sharpest taste buds in America and then describe the taste sensations of your favorite food. If you cannot access an Official Entry Form, you may hand print or type your entry on an 8 1/2 x 11 piece of paper. At the top of the paper, provide your name, complete mailing address, telephone number, date of birth and the signature of your parent/legal guardian. If you wish, you may include a recent photo of yourself with your favorite food. Mail your entry to ARM & HAMMER "Search for the Kid with the Sharpest Taste Buds" Contest, PMI Station, PO Box 3564, Southbury, CT 06488-3564.

Notes: Enter as often as you wish, but each written statement must be different, must meet all entry requirements and must be mailed separately.

WIN A VIP TRIP TO THE DAYTONA 500®

Entrance Deadline: All mail-in entries must be postmarked on or before November 30, 2005 and received by December 7, 2005. All online entries must be received by 11:59 p.m. Eastern Time on November 30, 2005.

Prize(s): Trip for winner and one guest to Daytona Beach, FL to attend the DAYTONA 500® weekend races in 2006 and spend time with Benny Parsons. Trip includes: round-trip coach air transportation from the major United States airport nearest to winner's home, hotel accommodations in Daytona Beach, FL (one room, based on double occupancy) for five nights, two suite hospitality passes for NASCAR Busch Series and NASCAR NEXTEL Cup Series™ races at Daytona International Speedway®, VIP access, subject to NASCAR, Inc.'s standard rules and procedures, opportunity for winner to be an honorary pit crew member (subject to control of NASCAR and/or track officials), attendance at driver introductions and at Benny Parson's Thursday night radio show with select drivers and meet-and-greet sessions with Dodge team and Hungry Driver (all of the foregoing based on availability of Parsons and the drivers), an autographed copy of Benny Parson's cookbook, an autographed apron by Benny Parsons and \$500 spending money for winner ARV \$6,535.

Eligibility Requirements: Open to legal U.S. residents, 18 years of age and older.

Entry Procedures: There are two ways to enter: (1) Official Entry Forms will be available at participating retailers from March 14, 2005 through November 30, 2005 or while supplies last. On an Official Entry Form or plain 3" x 5" paper, hand print your name, full address, including zip code, daytime telephone number and date of birth and mail your completed entry in a hand-addressed, stamped envelope, to: Hellmann's® Sweepstakes, P.O. Box 7320, Melville, NY 11775-7320. (2) Via the Internet, visit www.hellmanns.com or www.best-foods.com and fill in all required entry information.

Drawing: Drawing will be conducted on or about December 15, 2005.

Notes: One mail-in entry per envelope. One online entry per person/e-mail address, per day.

ULTIMATE HOME THEATER SWEEPSTAKES

Entrance Deadline: All entries must be received by July 21, 2005.

Prize(s): Home theatre package. ARV \$30,209.

Eligibility Requirements: US and DC 18+.

Entry Procedures: To enter online, complete the online entry form provided at www.WinAFreePlasmaTV.com. By completing the online entry form, you are agreeing to be notified by e-mail if you are the winner of the Sweepstakes. Alternatively, to enter by mail, send a 3 1/2 x 5 1/2 postcard, including your name, address, phone number, age and e-mail address (if applicable) to Sweepstakes Entry, c/o 123 Click, Inc., P.O. Box 5225, Harrisburg, PA 17110.

Drawing: On or about July 30, 2005

Notes: Only one entry per person or e-mail address is permitted per day.

\$2,000,000 CASH CARDS INSTANT-WIN GAME

Entrance Deadline: Game ends July 31, 2005.

Prize(s): \$2,000,000, payable in forty equal annual installments of \$50,000, without interest.

Eligibility Requirements: Open to legal residents of the U.S. (excluding Puerto Rico, New York and Florida) and Canada (excluding Québec) who have reached the age of majority in the jurisdiction in which they reside.

Entry Procedures: Visit www.jackpot.com and register to play the \$2,000,000 Cash Cards Game. Each Game Day, log on to the Site and you will be presented with a virtual slot machine displaying three reels, a pull-down handle and a small prize table that displays the Grand Prize. Clicking on the pull down handle will make the reels spin. If you click the handle at a randomly predetermined winning moment the three symbols on the reels will match and you will be deemed a potential winner, subject to eligibility verification.

Notes: You may play as many times as remaining credits displayed.

ATTACHMENT 5

JACKSON HEWITT WRITE YOUR OWN REFUND SWEEPSTAKES

Entrance Deadline: Internet entries must be received by August 31, 2005, by 11:59 p.m. EST. All mail-in entries must be postmarked by August 31, 2005 and must be received by September 15, 2005, or they will be void.

Prize(s): A check for \$25,000.

Eligibility Requirements: The Sweepstakes is open to legal residents of the fifty (50) United States (including the District of Columbia) who are aged eighteen (18) and over as of the date of entry.

Entry Procedures: Visit www.jacksonhewitt.com/bic and register for the Sweepstakes by including your full name, address (no PO Boxes), phone number, age and optional email address and clicking "Submit". To enter by mail, send a legibly handwritten postage-paid postcard no larger than 4½ inches by 6 inches (no envelopes) to "BIC Jackson Hewitt Write Your Own Refund Sweepstakes" at P.O. Box 5259, Clinton, IA 52736-5259. Include your first and last name, full mailing address, optional email address, age and phone number.

Drawing: The winner will be selected by random drawing from among all eligible Internet and mail entries received, which will take place on or about October 1, 2005.

Notes: Limit one (1) entry per person/family/household regardless of the method of entry.

FIND THE FISH, FIND THE FUN!

Entrance Deadline: Game ends March 31, 2006.

Prize(s): \$10,000 cash or gift certificates worth \$10,000 in merchandise.

Eligibility Requirements: Must be a US resident 18 or older

Entry Procedures: Official Game Pieces available in specially marked boxes, bags and buckets of Fisher Boy® products. To request an Official Game Piece without purchase, or to request Official Rules, send your request, along with a self-addressed, stamped envelope, to: Find the Fish, Find the Fun! Game Piece/Official Rules PO Box 935, Darien, CT 06820 (VT residents may omit return postage). Official Game Pieces available only while supplies last. Requests must be received no later than March 31, 2006. Limit one request per outer envelope.

To Claim A Prize: Make a photocopy of the winning Game Piece for your files and mail the original, complete winning Game Piece (no copies or mechanical reproductions accepted), along with a 3"x5" card, listing your name, address and daytime phone to Find the Fish, Find the Fun! Prize Claims, P.O. Box 917, Darien, CT 06820. Prize claims must be received by April 14, 2006.

Notes: Unlimited entries are permitted. To receive a list of prize winners, send a SASE (business size) to: Find the Fish, Find the Fun! Winner's List Requests, P.O. Box 917, Darien, CT 06820. Requests must be received no later than May 31, 2006.

CANOE AND KAYAK SWEEPSTAKES

Entrance Deadline: Mailed entries must be postmarked by November 15, 2005 and received by November 21, 2005.

Prize(s): Credit of \$7,250 at Glacier Bay™ Cruiseline to be used towards a small ship Alaska adventure cruise for 2.

Eligibility Requirements: Sweepstakes open to legal residents of the United States and the District of Columbia 18 years of age or older.

Entry Procedures: Complete an official entry form or a 3" x 5" card and transmit, deposit, or mail entry as directed (all required information/fields must be fully and accurately completed). Official entry forms are available at www.canoekayak.com, in selected issues of Canoe & Kayak Magazine, in Canoe & Kayak Destination Guide and in Canoe & Kayak Beginner's Guide and at selected canoeing/kayaking events. For entry on a 3" x 5" card, include your name, address, e-mail address (if available), telephone number and age. Mail card in an envelope to Canoe & Kayak 2005 Reader Sweepstakes, P.O. Box 698, Dana Point, CA 92629-0698.

Drawing: On or about December 15, 2005, winners will be selected by random drawing from all eligible entries received.

Notes: Limit one entry per person/e-mail address.

LIQUID OR ICE SWEEPSTAKES

Entrance Deadline: October 1, 2005

Prize(s): 4 day/3 night trip for winner and three guests to Los Angeles, CA and the chance to meet Haylie and Hilary Duff. Trip consists of round trip coach air transportation to/from major airport nearest winner's U.S. residence, quad occupancy hotel accommodations in Beverly Hills, CA ground transportation to/from Los Angeles, CA airport, use of a private limo for two days (includes a private driving tour of Beverly Hills celebrity homes), a haircut and makeover at a Beverly Hills salon and \$2,500 in spending money for a Rodeo Drive shopping spree. ARV \$9,000.

Eligibility Requirements: Open only to legal residents of the 50 United States and the District of Columbia with a valid email address.

Entry Procedures: Visit www.liquidorice.com during the Entry Period, complete the Official Online Entry Form and submit as instructed to register for sweepstakes.

Notes: One entry per person per day.

WIN A DAY OF BEAUTY IN MIAMI

Entrance Deadline: Online entries must be received by August 30, 2005. Mail-in entries must be postmarked by August 31, 2005 and received by September 7, 2005.

Prize(s): Trip for 6 to Miami, FL to a taping of SÁBADO GIGANTE on dates designated by Sponsor sometime in February - May 2006, the opportunity for the winner and guests to attend a Sponsor hosted dinner and the opportunity for the winner to attend a beauty makeover by Sissi's Stylists (beauty makeover includes hair, makeup and clothes). Trip consists of round-trip coach class air travel for winner and five guests from major airport nearest winner's residence to Miami, FL; 3 days/2 nights hotel accommodations (3 rooms; double occupancy); round-trip ground transfers for 6 between airport/hotel; round-trip ground transfers for 6 between hotel/Univision Studios for taping of SÁBADO GIGANTE; and \$1,000 spending money. Must be 18 yrs. or older to attend the taping of SÁBADO GIGANTE. ARV \$11,600.

Eligibility Requirements: Open to residents of the United States, 18 years and older as of March 1, 2005.

Entry Procedures: There are two ways to enter: (1) Beginning on March 1, 2005 through August 31, 2005, visit www.comidakraft.com and follow the on-screen entry instructions. OR, (2) On an official entry form available at participating retailers, or on a 3" x 5" paper, hand-print your name, address, city, state, zip code and daytime telephone number and mail to: A Day of Beauty with Kraft Sweepstakes, P. O. Box 1882, Elgin, IL 60121-1882.

Drawing: Winners will be selected on or about September 14, 2005, from among all eligible entries received.

Notes: Limit one entry per email address or outer mailing envelope per person per day. For the names of the winners, available after October 17, 2005, send a self-addressed, stamped (#10) envelope to: A Day of Beauty with Kraft Sweepstakes Winners, P.O. Box 1830, Elgin, IL 60121-1830 to be received by September 7, 2005.

WIN FREE HOUSE PAYMENTS FOR A YEAR

Entrance Deadline: The Promotion Period consists of three entry periods. The Entry Periods are as follows: Entry Period #1, 12:01AM ET on April 1, 2005 to 11:59PM ET on June 30, 2005; Entry Period #2, 12:01AM ET on July 1, 2005 to 11:59PM ET on September 30, 2005; Entry Period #3, 12:01AM ET on October 1, 2005 to 11:59PM ET on December 31, 2005.

Prize(s): A check for \$18,000 plus all applicable taxes that can be applied to winner's mortgage payments.

Eligibility Requirements: Open only to legal residents of the United States and the District of Columbia who are 18 years of age or older.

Entry Procedures: To enter via mail, print your name, address, daytime and evening telephone numbers, age and email address and Ameriquest "Win Free House Payments for a Year" Sweepstakes on a 3"x 5" card and mail in an envelope with proper postage to: "Ameriquest Win Free House Payments for a Year Sweepstakes", c/o ePrize, LLC, P.O. Box 8070, Royal Oak, MI 48068-8070. To enter online, visit <http://www.ameriquest.com/house> and follow links and instructions for entry. Fill out online entry form completely and submit. You will automatically receive one (1) entry into the Sweepstakes.

Drawing: Three Grand Prize Drawings will be conducted on or about July 21, 2005 for Entry Period #1, on or about October 21, 2005 for Entry Period #2 and on or about January 21, 2006 for Entry Period #3.

Notes: One entry per person, per email address per Entry Period, regardless of method or combination of methods of entry.

JEEP HEROES SWEEPSTAKES

Entrance Deadline: All entries must be received by October 31, 2005.

Prize(s): 2006 Jeep Grand Cherokee Laredo. ARV \$26,775.

Eligibility Requirements: US residents 18 or older with a valid driver's license.

Entry Procedures: Log onto www.jeep.com/nominate and complete and submit the Official Online Entry Form. Include your complete name, address including zip code, daytime and evening telephone numbers and your e-mail address and the name of a current employee or volunteer of the Law Enforcement (Police & Sheriff), Fire or Emergency Medical Service/Paramedic departments or active member of the U.S. Military or Armed Forces and prepare an essay in 200 words or less on why you believe this Nominee deserves to be honored as a "Jeep Hero". You may enter more than once, however each entry must be submitted for a different Nominee.

Judging: All entries submitted will be separated into one of four categories as stated herein: Law Enforcement (Police and Sheriff); Firefighter; Emergency Medical Service/Paramedic; and U.S. Military/Armed Forces. The Finalists will be selected based on the following judging criteria: Self-Initiative of the Nominee (0-25 points); Originality of the Nominee's Endeavor (0-25 points); Nominee's Enthusiasm (0-25 points); and Impact on the Community or Individual as a result of the Nominee's Endeavor (0-25 points). Three Finalists will be selected in each of the four categories stated herein for a total of twelve Finalists. One (1) Grand Prize Winner will be selected from among each of the three (3) Finalists selected in each of the four (4) categories for total of four (4) Grand Prize Winners. Grand Prize Winner will be announced on November 10, 2005.



JUDICIAL OFFICER

2101 WILSON BOULEVARD, SUITE 600
ARLINGTON VA 22201-3078
703-812-1900 FAX: 703-812-1901

CEASE AND DESIST ORDER NO. CD-4625

January 4, 2007

RE: KEYSTONE ASSOCIATES INC. and
SOLARIS DIRECT INC. all d/b/a
AMERICAN PRIZE PUBLICATIONS and as
APP and as WIN AMERICA and as
AMERICAN AWARD ADVISORY and as
AMERICAN SWEEPS REGISTRY
P.S. Docket No. FR 06-224

I. Authority and Scope:

This Order is issued pursuant to 39 U.S.C. §3005(a)(3), and extends to any use of promotional materials or other activities in which any person identified in Paragraph II, below, individually or through any corporate or other device, or under any name or names, seeks the remittance of money or property through the mail, directly or indirectly.

II. Persons Covered:

This Order binds the corporate respondents KEYSTONE ASSOCIATES INC., and SOLARIS DIRECT INC., all doing business as AMERICAN PRIZE PUBLICATIONS, APP, WIN AMERICA, AMERICAN AWARDS ADVISORY, and AMERICAN SWEEPS REGISTRY, and anyone who would be bound by an injunction issued against any of them (hereinafter collectively referred to as "Respondents") pursuant to Federal Rule of Civil Procedure 65.

III. Conduct Prohibited:

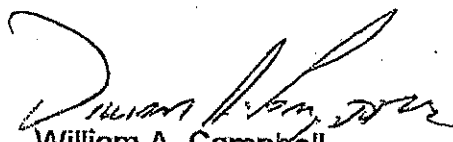
Respondents are ordered to cease and desist immediately from falsely representing, directly or indirectly, in substance and effect, whether by affirmative statements, implications or omissions that:

(a) Recipients of Respondents' solicitations have won a substantial amount of money as a prize; and

(b) That any of Respondents' solicitations comply with Federal law.

In addition, Respondents are ordered to cease and desist immediately from mailing any solicitations which do not conform to the requirement of 39 U.S.C. §3001(k) (3) (A) (VIII) where the solicitations represent that an individual is a winner of a prize and this representation is false.

Respondents further are ordered to cease and desist immediately from mailing any solicitations which imply any Federal Government connection, approval or endorsement in violation of 39 U.S.C. §3001(h).


William A. Campbell
Judicial Officer

UNITED STATES POSTAL SERVICE
ARLINGTON, VA 22201-3078

In the Matter of the Complaint
Against:

KEYSTONE ASSOCIATES INC.
and
SOLARIS DIRECT INC.
all d/b/a
AMERICAN PRIZE PUBLICATIONS
and as
APP
and as
WIN AMERICA
and as
AMERICAN AWARD ADVISORY
and as
AMERICAN SWEEPS REGISTRY
all at
P.O. BOX 1101
Southeastern, PA 19398-1101
and at
P.O. Box 24605
West Palm Beach, FL 33416-4605,
RESPONDENTS.

AGREEMENT CONTAINING
CONSENT ORDER TO CEASE AND DESIST

For and in consideration of the Complainant's offer to move to suspend further proceedings under the postal false representation and lottery statutes, 39 U.S.C. § 3005 (1999), concerning certain conduct and representations described in the Complaint, which is incorporated herein and made a part of this agreement by reference, to be filed by the Chief Postal Inspector, Respondents KEYSTONE ASSOCIATES INC., and SOLARIS DIRECT INC., all doing business as AMERICAN PRIZE PUBLICATIONS, APP, WIN AMERICA,

AMERICAN AWARD ADVISORY, and AMERICAN SWEEPS REGISTRY, and other names similar thereto, all herein referred to as Respondents, agrees and consents as follows:

1. This Agreement shall be binding on Complainant, Respondents, their successors, assigns, officers, agents, servants, employees and those persons in active concert or participation with them who receive actual notice by personal service, facsimile or otherwise, whether acting directly or through any corporation, subsidiary, division or other device, as well as all persons who would be bound by an Order under Rule 65 of the Federal Rules of Civil Procedure.
2. This Agreement is for settlement purposes only, and that nothing herein may be taken as or construed to be an admission or concession of violation of law, nor of any liability or wrongdoing, all of which Respondents expressly deny. Nor may it be construed to constitute a civil, criminal or administrative action against Respondents for the violation of any applicable statute in any other state or federal jurisdiction. Further, no aspect of this agreement is intended to be construed as constituting evidence against Respondents in any action to be brought for violation of any federal statute, other than for breach of this agreement.
3. Respondents agree to permanently discontinue the practice of mailing sweepstakes material through the mail which contains the representations listed in Attachment B, Section III under any name or names, or through any corporate or other device.
4. Respondents agree that all mail addressed to following addresses: P.O. Box 1101, Southeastern, PA 19398-1101; and P.O. Box 24605, West Palm Beach, FL 33416-4605, may be withheld from delivery by the postmaster for a period of sixty days, beginning on the date that Respondents sign this Agreement. During this time Respondents may inspect the withheld mail in the presence of the Postmaster or his agent at days of the week and times

mutually agreeable between the Postmaster or his agent and Respondent and receive any mail not sent in response to the subject mailings. Once reviewed by Respondents, the withheld mail will be returned to the senders stamped: "PROMOTION DISCONTINUED." Following the return of mail after the sixty-day time period, Respondents agree to permanently discontinue and abandon the subject post office boxes, however, any mail received thereafter will continue to be withheld from delivery and returned to sender endorsed the same.

5. Respondents agree to pay full refunds to any persons who paid monies to Respondents in connection with the subject promotion and who has requested a refund or requests a refund in the next 60 days. Refunds shall be due and owing to the requestor within fourteen days of their receipt by Respondents. If Respondents fail to make any refund in a timely manner, the Inspection Service may require Respondents to produce all of their business records pertinent to their sweepstakes business, including but not limited to documents showing their accounts receivable, bank ledgers, check books, tax returns for the years 2004 and 2005, any requests for refunds in their possession, and proof of payment of any refund.

6. Respondents agree and consent that the Judicial Officer¹ may issue an order to cease and desist under 39 U.S.C. § 3005(a)(3) in the form attached to the Complaint as Attachment B. In connection with the issuance of such order, Respondents waive any further notice that the order will be issued, the right to a hearing with regard to the propriety of the order, other procedural steps at the administrative level that relate to the order, and the requirement that the order be accompanied by any findings of fact or conclusions of law.

Respondents understand that failure to comply with this order to cease and desist could result in the imposition of civil penalties pursuant to 39 U.S.C. § 3012.

¹ The term "Judicial Officer" as used in this agreement, shall include the Associate Judicial Officer or any other person designated by the Judicial Officer.

7. An enforcement action for violation of this or any other provision of this Agreement may be brought pursuant to 39 U.S.C. § 3012, in the district court of the United States where Respondents have breached a material portion of this agreement by mailing promotions of the type described in paragraph 3 of this Agreement to any addressee.

8. A breach of this Agreement by Respondents or any other party in privity with Respondents, after giving Respondent's counsel of record at least 72 hours prior notice, will result in a petition for the issuance of an order or orders pursuant to 39 U.S.C. § 3005 (a), against Respondents or any other name or names that they may be using, in accordance with the following procedures:

a. The Chief Postal Inspector of the Postal Service may file a petition with the Judicial Officer, U.S. Postal Service, setting forth the alleged violation of this agreement and requesting the issuance of the order described in 39 U.S.C. § 3005 (a) against Respondents by whatever name or names Respondents may be employing. Upon filing of such petition the Judicial Officer may find that the allegations of said petition and supporting evidence make a prima facie showing that this Agreement has been breached. If the Judicial Officer makes such a finding, he/she may issue an interim order directing that mail received for delivery to the name and address in said petition be detained by the Postal Service pending final administrative determination of the allegations of said petition and judicial review thereof.

b. Said interim order shall afford the Respondents an opportunity to survey the outside cover of any detained mail at reasonable times in the presence of the Postmaster or his agent, and to receive any part of such detained mail clearly not related to the promotion described in said petition.

c. A copy of the petition shall be served on Respondents or Respondents' attorney. Respondents shall have the right to reply to the petition. No hearing on such petition will be held except as ordered by the Judicial Officer.

d. The Judicial Officer may also issue a supplemental order to cease and desist as authorized by 39 U.S.C. § 3005(a)(3), if appropriate.


9. This Agreement relates exclusively to 39 U.S.C. § 3005, and shall not constitute a defense or a release of Respondents from any responsibility for violation of any other statute.

10. Respondents hereby waive and abandon any claim or right of action, if any, in connection with this proceeding arising under the Equal Access to Justice Act, 5 U.S.C. § 504 (1994), amended by Pub. L. No. 104-121, 110 Stat. 847, 862-63 (1996), and the rules and regulations thereunder, 39 C.F.R. part 960.

11. The failure of Complainant to seek or obtain the remedies described in this agreement shall not preclude him from seeking any other remedial relief to which he may be entitled.

12. No officer, employee, or agent of the United States Postal Service has expressly or implicitly, directly or indirectly, accepted or approved any practice presently employed or contemplated for future use by Respondents.

13. Respondents acknowledge that they have read the Complaint and this Agreement, that they have had an opportunity to review and discuss both documents with an attorney or other person of their own choosing, and they execute this agreement voluntarily. This Agreement is effective on the date it is signed by all parties.


PAUL A. GLUCHANICZ, as an
Officer/Director of KEYSTONE
ASSOCIATES, INC. and SOLARIS
DIRECT, INC. and d/b/a American Prize
Publications, APP, Win America, American
Award Advisory, and American Sweeps Registry

Date

11/22/06


Witnessed:

Name

Date

Approved:


ON BEHALF OF RESPONDENTS BY:


ANDREW B. LUSTIGMAN, ESQ.
The Lustigman Firm, P.C.
149 Madison Avenue, Suite 805
New York, NY 10016

Date

11/30/06

ON BEHALF OF COMPLAINANT BY:


JAMES PUCHALA
Inspector Attorney
PO Box 3000
Bala Cynwyd, PA 19004

Date

11/17/06